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August 21, 2001
EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996*
Docket No. 97-00309


Dear David:

At the request of the Hearing Officer the intervening carriers collectively submit the attached discovery requests to BellSouth Telecommunications, Inc. The request is filed on behalf of Covad Communications, Inc., MCI WorldCom, Inc., XO Tennessee, Inc., Time Warner, AT&T Communications of the South Central States, Inc. and the Southeastern Competitive Carriers Association. It is the understanding of the carriers that this collective submission may exceed the forty questions per party rule normally filed by the agency.

Copies have been forwarded to parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker *HW*

HW/nl
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)
Docket to Determine the)
Compliance of BellSouth)
Telecommunications, Inc.'s)
Operational Support Systems with)
State and Federal Regulations)

Docket No.: 01-00362

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., THE
SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION, BROOKS FIBER
COMMUNICATIONS OF TENNESSEE, INC., MCIMETRO ACCESS
TRANSMISSION SERVICES, LLC, TIME WARNER OF THE MID-SOUTH, LP, XO
TENNESSEE, INC. AND DIECA d/b/a COVAD COMMUNICATIONS COMPANY'S
FIRST DATA REQUEST TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T"), the Southeastern Competitive Carriers Association ("SECCA"), Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") and MCI metro Access Transmission Services, LLC ("MCI metro"), (collectively "WorldCom"), Time Warner Telecom of the Mid-South, LP, ("Time Warner"), XO Tennessee, Inc. ("XO"), and DIECA d/b/a Covad Communications Company ("Covad") serve upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before September 4, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.

2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.

3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.

4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. To the extent BellSouth has previously provided a response to any Interrogatory or has provided documents responsive to any of the following data requests in Tennessee or any other state in any other proceeding in which both BellSouth and AT&T are parties, BellSouth need not respond to such Interrogatory or document request again, but rather may respond to such Interrogatory or document request by identifying the prior response to such Interrogatory or document request by state, proceeding, and specifying the Interrogatory; provided however, that BellSouth indicate in its response that the prior production remains accurate, current and complete.

6. To the extent BellSouth previously has provided documents in Tennessee or any other state in any proceeding which are responsive to any of the following requests for production, BellSouth need not produce such documents again, but rather may satisfy such request by identifying the prior production of such documents by state, proceeding, and specific request for production; provided however, that BellSouth indicate in its response that the prior production remains accurate, current and complete.

7. “State all facts” or “state the factual basis” means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.

8. When used with reference to natural persons, the word “identify” or “identity” or the phrase “give the identity of” means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with BellSouth.

9. When used with reference to a document, the word “identify” or “identity” or the phrase “give the identity of” means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author’s identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession

or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

10. “Documents” is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth’s possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.

11. “Person” shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

12. “You” or “yours” means BellSouth and any agents or employees thereof.

13. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. (“KCI”) on March 20, 2001.

14. The “Florida OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission (“FPSC”) in Docket Nos. 981834-TP and 960786-TL.

15. “Status Report” refers to any KCI Interim Status Reports.

16. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: Please identify the individual who is best able to provide information on the existence and extent of competition for local service in Tennessee.

ANSWER:

INTERROGATORY No. 3: Provide the total number of BellSouth lines for Tennessee, including switched and special access lines.

ANSWER:

INTERROGATORY No. 4: Provide the total number of CLEC lines for Tennessee.

ANSWER:

INTERROGATORY No. 5: Provide, by quarter, the total number of minutes exchanged with CLECs from 1996 to the present.

ANSWER:

INTERROGATORY No. 6: For each of the past five years, provide the number of minutes interchanged between BellSouth and CMRS networks in Tennessee. Separately identify:

- A. The number of minutes originating with CMRS customers and terminating with BellSouth.
- B. The number of minutes originating with BellSouth and terminating on CMRS networks.

ANSWER:

INTERROGATORY No. 7: Provide for each of the last five years, the total number of BellSouth's Tennessee:

- A. Local minutes
- B. Local calls
- C. IntraLATA toll minutes
- D. IntraLATA toll calls
- E. InterLATA access minutes
- F. InterLATA access calls

ANSWER:

INTERROGATORY No. 8: Provide the annual revenue received by BellSouth in Tennessee for each of the past five years:

- A. For the lease of unbundled network elements; and
- B. For the provision of resold services.

ANSWER:

INTERROGATORY No. 9: For the most recent six-month period, please provide BellSouth's monthly wholesale revenues on a Tennessee-specific and regional basis, for each of the following:

- A. Residential resale;
- B. Business resale;
- C. Unbundled network elements; and
- D. Interconnection.

ANSWER:

INTERROGATORY No. 10: Provide the number of interconnection trunks between BellSouth and CLECs in Tennessee separately identified between:

- A. One way trunks delivering CLEC originated traffic to BellSouth;
- B. One way trunks delivering BellSouth originated traffic to CLECs;
- C. Two way trunks between BellSouth and CLECs; and
- D. Any other type of interconnection trunk, with a brief description explaining its function.

ANSWER:

INTERROGATORY No. 11: From the time period November 1, 2000 to the present, please describe:

- 1) How many separate times BellSouth disconnected interconnection trunks in Tennessee and each of the other states in BellSouth's region. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
- 2) In what specific locations did BellSouth disconnect interconnection trunks in Tennessee and each of the other states in BellSouth's region;
- 3) In the above instances, how many days prior to the disconnect did BellSouth notify AT&T that the disconnect would occur; and
- 4) In how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?

ANSWER:

INTERROGATORY No. 12: What is the percentage of NGDLC in BellSouth's network in Tennessee and in each of the other states in BellSouth's region?

ANSWER:

INTERROGATORY No. 13: Please identify charges assessed by BellSouth to AT&T for cable under USOC PE1PM (cable) at the following Tennessee collocation site:

NSVLTNDOXAX. Please identify what this recurring charge is for. If it is for power cable, please identify for each location, if the cable is feeding power from a BellSouth BDFB or directly from the power equipment.

ANSWER:

INTERROGATORY No. 14: Identify precisely how each of BellSouth's charges for optional daily usage files and access daily usage files are applied. Is BellSouth currently assessing these charges? If yes, when did BellSouth begin to apply these charges?

ANSWER:

INTERROGATORY No. 15: Does BellSouth support any particular expedited dispute resolution procedure? If so, describe in detail that procedure.

ANSWER:

INTERROGATORY No. 16: For the months of January 2001 through July 2001, please state, by month, the percentage of coordinated cutovers that involved IDLC in Tennessee and in each of the other states in BellSouth's region.

ANSWER:

INTERROGATORY No. 17: For the months of January 2001 through July 2001, please state the number and percentage of coordinated customer conversion service orders involving IDLC in Tennessee and in each of the other states in BellSouth's region for which BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

ANSWER:

INTERROGATORY No. 18: Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders and the service order accuracy rate for BellSouth's retail operation for Tennessee and in each of the other states in BellSouth's region. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs.

ANSWER:

INTERROGATORY No. 19: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about or responsible for implementing the change control processes used to manage changes made to interfaces and processes used in BellSouth's retail operations.

ANSWER:

INTERROGATORY No. 20: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for implementing the OSS functionality provided to BellSouth's retail operation in comparison to that which is provided to AT&T, including certain issues pending in the change control process, such as:

- A. the provision of parsed customer service records for pre-ordering;
- B. the provision of the ability to submit orders electronically for all services and elements; and
- C. the provision of electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel.

ANSWER:

INTERROGATORY No. 21: Identify the members of all groups of BellSouth employees and its contractors or vendors associated with BellSouth's review and implementation of

change requests under the Change Control Process Document. This should include but not be limited to the groups known as the “Triage Committee”, the “Change Review Board”, the “Directors Committee”, the “Release Prioritization Team”, the “Third Party Testing Team”, the “Regulatory Team” the “LCSC Team”, the “Project Managers”, the “BellSouth IT Team”, and “BTSP”.

ANSWER:

INTERROGATORY No. 22: List and identify the purpose of all changes implemented to the BellSouth retail interfaces known as the Regional Negotiation System (RNS) and Regional Ordering System (ROS) from January 2000 to the present.

ANSWER:

INTERROGATORY No. 23: Provide LCSC employee monthly turn-over (retention) rates from January 2000 to the present.

ANSWER:

INTERROGATORY No. 24: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about the internal measures that BellSouth utilizes to monitor and manage the

productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's retail operations, wholesale operations, or both. Such internal measures may include, but are not limited to, those external measures contained in BellSouth's Service Quality Measurement Plan that was ordered by the Georgia Public Service Commission.

ANSWER:

INTERROGATORY No. 25: Please identify each BellSouth SQM measure upon which BellSouth relies in Tennessee that differs from the comparable SQM measure approved by the Georgia Commission, and for each, describe the nature of the difference.

ANSWER:

INTERROGATORY No. 26: At any time since January 2000, has BellSouth had any policies or practices to provide a higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance and repair and billing) to CLEC service requests (e.g. resale, unbundled network elements, or interconnection for customers in Georgia or Florida as compared to similar orders for CLEC customers in other states in the BellSouth region, such as Tennessee? If so, please:

- A. describe such policies or practices;
- B. state the purpose of such policies and practices; and

C. identify the person within BellSouth who was responsible for instituting such policies and practices.

ANSWER:

INTERROGATORY No. 27: Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's retail operations, wholesale operations, or both. The work centers and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center; (c) regional central office operations; (d) regional installation and maintenance operations; (e) regional engineering and construction operations; (f) work management centers; (g) network reliability center; (h) address/facility inventory group; (i) circuit provisioning group; (j) customer wholesale interconnection services (CWINS) center; (k) billing data centers.

ANSWER:

INTERROGATORY No. 28: Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

ANSWER:

INTERROGATORY No. 29: Please state the amounts that BellSouth has paid Pricewaterhouse Cooper for:

(A) Its two regionality reports; and

(B) Any financial audit services since January 2000.

ANSWER:

INTERROGATORY No. 30: Describe the process by which BellSouth updates the following databases to reflect services ordered by a CLEC: (1) the Line Identification Database or LIDB; (2) the directory assistance database (i.e., the database accessed by BellSouth's directory assistance personnel); and (3) the 911 database (i.e., the database accessed by 911 personnel).

ANSWER:

INTERROGATORY No. 31: For the period reported in each Form 477 filed with the FCC, identify the number of unbundled loops by:

- A. Analog loops
- B. DS-1 unbundled loop
- C. DS-3 unbundled loops

ANSWER:

INTERROGATORY No. 32: Please describe in detail the process BellSouth uses to migrate a customer from BellSouth to a CLEC when the CLEC is reselling BellSouth's residential service. Please include in your description an explanation of all internal BellSouth orders (such as "D" orders and "N" orders) used to facilitate the migration and the provisioning systems those orders flow through.

ANSWER:

INTERROGATORY No. 33: BellSouth has stated that of 141 cases of lost dial tone presented to it by MCI from its Georgia launch, BellSouth has identified 11 cases where dial tone was lost because of BellSouth's two order provisioning process, when the "D" and "N" orders became disassociated. With respect to these eleven cases, please:

- (a) Identify the LSR or PON involved;
- (b) Provide the customer telephone number involved;

- (c) Describe in detail why the D order and the N order were not associated;
- (d) State the reason reported to MCI for loss of dial tone;
- (e) State the internal BellSouth disposition and cause codes that were used for these incidents; and
- (f) State how these eleven incidents were reflected in the BellSouth metrics of customers who lost dial tone within ten days of installation.

ANSWER:

INTERROGATORY No. 34: At what point in the migration cycle is the BellSouth retail organization informed that a residential customer has (or is in the process of) migrating to a CLEC? How is that notification made? For example, does the BellSouth retail organization receive a line loss report similar to the report that CLECs receive when a customer migrates back to BellSouth or to another CLEC? How is the notification to the BellSouth retail organization triggered? Is it triggered by the FOC, the SOC, when the billing has been changed or based on some other transaction?

ANSWER:

INTERROGATORY No. 35: Please provide the complete history of the following 10 MCI accounts, including whether they ever fell into a hold file, whether they are in a hold file, whether these customers have migrated to another carrier, and, if so, the identity of the carrier to which the customer migrated.

	No CSR for MCI	Order #	PONS
1.	4042413169	N01RFMF5	S003198527BSGAPR
2.	4043490504	N05PTVQ5	S003206215BSGAPR
3.	4043492056	NOFYGRN2	S003219991BSGAPR
4.	4043700252	N0F6WKN2	S003216955BSGAPR
5.	4047581258	N0CTQHT4	S003203120BSGAPR
6.	4047613326	N0D2QHC6	S003214537BSGAPR
7.	4047920664	N00M2DB9	S003195972BSGAPR
8.	4047942712	N02PFVB9	S003214183BSGAPR
9.	6785130298	NP654FY7	S003201811BSGAPR
10.	6785602452	N)43RHY3	S003216238BSGAPR

ANSWER

INTERROGATORY No. 36: BellSouth states that the majority of MCI LSRs did not flow through because they had special pricing plans or were partial migrations. Of the total that did not flow through:

(A) How many did not flow through because of special pricing plans?

(B) What were the special pricing plans involved? Please list them specifically.

(C) How many LSRs did not flow through because they represented a partial migration?

ANSWER:

INTERROGATORY No. 37: BellSouth has stated that manual work is required to migrate a customer as specified with the retail Complete Choice pricing plan to a CLEC. Please explain what work is performed and how this work differs from the automated processes used to migrate a customer as specified to a CLEC when the customer does not have this special pricing plan.

ANSWER:

INTERROGATORY No. 38: Please provide the reasons for the MCI-caused rejects during a week of July 2001, representing 95% of all errors on MCI LSRs.

ANSWER:

INTERROGATORY No. 39: Please provide the reasons that other orders did not flow through and the number of orders in each category that did not flow through.

ANSWER:

INTERROGATORY No. 40: What percentage of BellSouth retail customers lose dial tone when a record change is made to their account? What percent of BellSouth retail customers lose dial tone when a feature is added?

ANSWER:

INTERROGATORY No. 41: Does BellSouth have internal criteria that it uses to evaluate its account teams? Please specify such criteria in detail.

ANSWER:

INTERROGATORY No. 42: Please describe in detail the process BellSouth uses to migrate a customer from BellSouth to a CLEC when the CLEC requests the migration "as specified" in an order for UNE-P service. Please include in your description an explanation of all internal BellSouth orders (such as "D" orders and "N" orders) used to facilitate the migration and the provisioning systems those orders flow through.

ANSWER:

INTERROGATORY No. 43: If BellSouth issues multiple internal orders to migrate a customer as specified from BellSouth to the CLEC providing UNE-P service to customers, please specify the process used to keep these orders together (or, in other words, related) as they flow through BellSouth's provisioning systems.

ANSWER:

INTERROGATORY No. 44: Has BellSouth experienced problems keeping multiple internal orders related so they are executed in the proper sequence? What is the customer impact when such orders are executed out of sequence?

ANSWER:

INTERROGATORY No. 45: When BellSouth provisions a CLEC UNE-P order, and the order is for a migration as specified, what physical work does BellSouth perform to migrate the customer? Please include a description of all work done at any point in the process, including work done at the main distribution frame or in the BellSouth port translation systems.

ANSWER:

INTERROGATORY No. 46: Under what circumstances would BellSouth need to dispatch a technician to the customer's premise to provision a CLEC UNE-P order when the order is for a migration as specified?

ANSWER:

INTERROGATORY No. 47: Once BellSouth has provisioned service for a CLEC's UNE-P customer, what steps does BellSouth take to change the customer's customer service record ("CSR") to reflect the customer's migration to the CLEC? Please describe in detail those steps, approximately how long each step takes, and the systems and internal orders used to make the change. Are there any additional steps BellSouth takes to change its billing systems to reflect the customer migration? If so, please describe in detail those steps, approximately how long each step takes, and the systems and internal orders used to make the change.

ANSWER:

INTERROGATORY No. 48: As of what date does BellSouth begin to bill wholesale charges to a CLEC providing UNE-P service to a customer? For instance, does BellSouth begin to bill wholesale charges as of the date service is provisioned, as of the date the customer's CSR is changed, or as of some other date?

ANSWER:

INTERROGATORY No. 49: As of what date does BellSouth begin to provide daily usage information to a CLEC providing UNE-P service to a customer? For instance, does BellSouth begin to provide customer usage data covering the period beginning the date service is provisioned, covering the period beginning when the customer's CSR is changed, or covering the period beginning some other date?

ANSWER:

INTERROGATORY No. 50: As of what date does BellSouth cease its retail billing for customers that are being migrated to a CLEC when the CLEC is providing UNE-P service to the customer and the customer is migrated as specified?

ANSWER:

INTERROGATORY No. 51: Once BellSouth has provisioned service for a CLEC's UNE-P customer, what steps does BellSouth take to change its line information database ("LIDB") to reflect the change in service provider? Please describe in detail those steps, approximately how long each step takes, and the systems and internal orders used to make the change.

ANSWER:

INTERROGATORY No. 52: BellSouth has two USOCs for the UNE-P switch port – one with caller ID and one without caller ID. What is the purpose of these two USOCs? If a customer without caller ID wants to add caller ID at migration, must BellSouth change the port the customer was using? If so, how is that accomplished?

ANSWER:

INTERROGATORY No. 53: If an electronic UNE-P migration LSR as specified falls out for manual processing, how many orders does the BellSouth service representative enter? Are these orders typed separately or are they electronically “cloned?”

ANSWER:

INTERROGATORY No. 54: If an electronic UNE-P migration LSR as specified falls out for manual processing, does the BellSouth service representative use the service address provided on the CLEC LSR to create the “D” and the “N” order? If not, from what database or system does the representative obtain the service address for the “D” order and for the “N” order?

ANSWER:

INTERROGATORY No. 55: How is the LMOS database updated to reflect migration of a BellSouth retail customer to a CLEC serving the customer via UNE-P? If the “N” order falls into a hold file, is the update to the database delayed? If the “N” and the “D” order complete separately, how does that affect the manner in which trouble tickets are handled in the LMOS database?

ANSWER:

INTERROGATORY No. 56: If LMOS is not updated to reflect migration of a customer to a CLEC serving the customer via UNE-P, how are CLEC trouble reports reflected in BellSouth’s metric for troubles within thirty days? Would troubles in such cases be calculated as if they were for a BellSouth retail customer or for the CLEC’s customer?

ANSWER:

INTERROGATORY No. 57: Identify precisely how each of BellSouth’s charges for optional daily usage files and access daily usage files are applied. Is BellSouth currently assessing these charges? If yes, when did BellSouth begin to apply these charges?

ANSWER:

INTERROGATORY No. 58: What is the complete list of functions for wholesale and retail provisioning of line sharing and what are the associated task times?

ANSWER:

INTERROGATORY No. 59: Does BellSouth provide a line splitter in some line sharing arrangements with data-CLECs? If your answer is in the affirmative, please state on what terms and conditions the splitter is provided.

ANSWER:

INTERROGATORY No. 60: If a CLEC acquires the voice service for an end user that is presently in a line sharing arrangement between an ILEC providing voice service and a data-CLEC, when BellSouth has previously provided a line splitter or the same functionality to the data-CLEC, will BellSouth continue to provide the line splitter or functionality? If so, please state on what terms and conditions the same will be provided.

ANSWER:

INTERROGATORY No. 61: If BellSouth or its affiliate is providing data services to an end user in a line sharing arrangement, if a CLEC acquires the end user for voice service, will

BellSouth or its affiliate continue to provide data service using the shared lines? If so, please state on what terms and conditions the same will be provided.

ANSWER:

INTERROGATORY No. 62: Has BellSouth or an affiliate provided data services to an end user in a line sharing arrangement after a CLEC has acquired the end user for voice service? If so, please state on what terms and conditions when the same occurred, and on what terms and conditions the same was provided.

ANSWER:

INTERROGATORY No. 63: If a CLEC acquires the end user for voice service, and data service was not previously provided the end user using the shared line, will BellSouth or its affiliate provide data service using the shared lines? If so, please state on what terms and conditions the same will be provided.

ANSWER:

INTERROGATORY No. 64: Has BellSouth or an affiliate provided data service using the shared lines when a CLEC acquired the end user for voice service, and data service had not

previously provided the end user using the shared line? If so, please state on what terms and conditions the same was provided.

ANSWER:

INTERROGATORY No. 65: If a CLEC acquires the voice service for an end user and leases a loop-port combination from BellSouth, and the end user wants to obtain data services over the shared line, will the existing UNE combination have to be “replaced” with the unbundled loop, unbundled port, and cross connects?

ANSWER:

INTERROGATORY No. 66: If your answer to the preceding interrogatory is in the affirmative, will the new arrangement require a new service order?

A. If so, is there presently an ordering mechanism to “convert” the UNE combination to discrete elements (loop, port, cross connects)? Please describe the OSS (manual or electronic, type, etc.) by which the same is to be accomplished.

B. If not, when does BellSouth contemplate having such a mechanism, and with what system or systems?

ANSWER:

INTERROGATORY No. 67: What efforts, if any, is BellSouth undertaking to lower the provisioning interval of lines-shared loops? Please provide any and all information supporting your response.

ANSWER:

INTERROGATORY No. 68: Does BellSouth intend to have all its splitter installations reviewed for quality control? If so, when does BellSouth anticipate the review to take place? If not, what is the reason behind this decision? If such a check is completed, please produce research results regarding the total quality check of all splitter installations in all central offices in Tennessee.

ANSWER:

INTERROGATORY No. 69: What business processes have been changed since September to improve the provisioning of line sharing? What process improvements are being prepared for line sharing provisioning?

ANSWER:

INTERROGATORY No. 70: Please provide any standard collocation interconnection agreement terms and conditions that BellSouth uses for its interconnection agreements with competing local exchange carriers in Tennessee.

ANSWER:

INTERROGATORY No. 71: State whether terms or conditions for collocation, physical or virtual, are contained in BellSouth's tariffs for Tennessee. If so, identify the tariff(s).

ANSWER:

INTERROGATORY No. 72: State whether BellSouth disagrees with the findings or conclusions of the FCC in In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Dockets Nos. 98-147 and 96-98, FCC 00-297, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98 (rel. August 10, 2000) ("Order on Reconsideration"). If so, state the findings or conclusions with which BellSouth is in disagreement, whether BellSouth filed any comments with the FCC with regard to its proposed rulemaking that resulted in the Order on Reconsideration, and whether BellSouth has filed any motion, petition, comments or other legal document that states such disagreement(s), and the status of any such proceedings.

Please attach a copy of any such motion, petition or comment(s) to your answers to these interrogatories.

ANSWER:

INTERROGATORY No. 73: The Order on Reconsideration sets out a process by which ILECs may request additional provisioning intervals from a state commission. See Order on Reconsideration at ¶¶ 36, 37. State whether BellSouth filed anything with the Commission or the FCC to justify intervals longer than the national default standard stated in the Order on Reconsideration, and attach a copy of the same to your answers to these interrogatories.

ANSWER:

INTERROGATORY No. 74: For what states in BellSouth's nine (9) state territory does it contend the order entered by the FCC in In the Matter of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 ("BellSouth Conditional Waiver Order"), applies to a request for physical collocation?

ANSWER:

INTERROGATORY No. 75: State whether you contend that cageless physical collocation may not be provisioned in a shorter interval than caged physical collocation. If so, state each and every fact that supports your position.

ANSWER:

INTERROGATORY No. 76: State whether cageless and virtual collocation are set up physically the same way. If they are not, state the differences between these two forms of collocation.

ANSWER:

INTERROGATORY No. 77: State whether any time frame in which cageless collocation can be provisioned is also appropriate for virtual collocation. If not, state each and every fact supporting your position.

ANSWER:

INTERROGATORY No. 78: Will BellSouth provide DC power to collocated equipment in adjacent collocation space? If not, identify any provision of any code that supports your position that DC power should not be provided by BellSouth to adjacent collocation space.

ANSWER:

INTERROGATORY No. 79: Does BellSouth have any safety concerns regarding the use by CLECs of batteries in enclosed adjacent collocation space? If so, state each and every such concern.

ANSWER:

INTERROGATORY No. 80: State whether BellSouth has provided AC to its remote spaces, which it has then converted to DC power.

ANSWER:

INTERROGATORY No. 81: State whether BellSouth has offered to provide or has provided DC power in other collocation arrangements outside the central office; namely, with respect to collocation at the remote terminal. If so, identify each such offer or provision of DC power, and state the terms and conditions thereof.

ANSWER:

INTERROGATORY No. 82: State what federal universal service funds have been received by BellSouth during the last twelve months. Of the funds received, what have been spent or are designated to be spent for facilities that support or use BellSouth's retail DSL service?

ANSWER:

INTERROGATORY No. 83: Does or will BellSouth unbundle dark fiber it leases either from a third party or from one of its subsidiaries?

ANSWER:

INTERROGATORY No. 84: How is leased dark fiber inventoried?

ANSWER:

INTERROGATORY No. 85: How does BellSouth deploy and provision dark fiber for one of its subsidiaries? Specifically, what are the terms and conditions (interval, maintenance, number of cross connects, number of strands, reclamation, etc.) governing such deployment and provisioning? Please provide all documents supporting your response.

ANSWER:

INTERROGATORY No. 86: Where has BellSouth deployed Wave Division Multiplexing? Please provide all documents supporting your response.

ANSWER:

INTERROGATORY No. 87: What is BellSouth's present day market share of the Tennessee DSL market? Please provide all documentation supporting your response.

ANSWER:

INTERROGATORY No. 88: Of all of BellSouth's loops currently in service, what percentage of those loops is used for its own retail services? Please provide all documentation supporting your response.

ANSWER:

INTERROGATORY No. 89: How many CLEC customers have been rejected for DSL service because a loop needed to be conditioned? Of those rejected, how many of the customers were able to get DSL service because BellSouth located another loop for them that did not require conditioning?

ANSWER:

INTERROGATORY No. 90: What is BellSouth's schedule for deployment of its remote DSLAMs?

ANSWER:

INTERROGATORY No. 91: How many customers will each BellSouth remotely deployed DSLAM have access to? Please provide all documentation supporting your response.

ANSWER:

INTERROGATORY No. 92: How much of the cost of deploying BellSouth remote DSLAM capability is directly attributable to the provisioning of data services as opposed to providing voice services? Please provide all information supporting your response.

ANSWER:

INTERROGATORY No. 93: Except for prioritization of central office build-out, for what other purposes are CLEC and retail forecasts used?

ANSWER:

INTERROGATORY No. 94: Where has BellSouth deployed VDSL?

ANSWER:

INTERROGATORY No. 95: What percentages of BellSouth's outside plant is aerial, underground and buried in Tennessee? Please provide all documents supporting your response.

ANSWER:

INTERROGATORY No. 96: What are the task times/functions required to provision a stand-alone loop for a CLEC?

ANSWER:

INTERROGATORY No. 97: How many technicians in Tennessee performing xDSL provisioning are design techs trained in xDSL? Are there any other techs trained in xDSL? If so, how many of those technicians are performing xDSL provisioning? How many contract technicians are performing xDSL provisioning in Tennessee? What training, if any, do contract technicians receive regarding xDSL?

ANSWER:

INTERROGATORY No. 98: What percentage of the time does BellSouth meet its cooperative acceptance testing (with coordinated installation) commitments on time for

CLECs? To the extent that BellSouth performs an acceptance testing process for its retail consumers, what percentage of the time does BellSouth meet its retail testing commitments?

ANSWER:

INTERROGATORY No. 99: What is the difference in price between a two-wire non-load loop and an ADSL-capable loop in Tennessee?

ANSWER:

INTERROGATORY No. 100: Provide copies of all complaints, verbal or written, filed by competing carriers concerning problems with BellSouth's OSS including the LCSC and LENS since January 1, 2000.

ANSWER:

REQUESTS FOR DOCUMENTS

1. Please provide any and all documents related to and relied upon in responding to CLECs' Interrogatories to BellSouth.
2. Please provide all documents referring or relating to any actual, contemplated, or proposed economic studies of the demand or market for local telephone services in any of the states in BellSouth's region or in part or all of the region.
3. Provide each Form 477 filed by BellSouth with the FCC for Tennessee and for each other state in the BellSouth region.
4. Please provide Trunk Group Service Detail for all CLEC trunks that had blocking in excess of 3% during the months of Nov. 2000 through June 2001 in Tennessee. Please provide this information in electronic form on an Excel spreadsheet or equivalent.
5. Please provide all reports, data, analysis, or other documents that describe, refer, or relate to BellSouth's procedures for augmenting interconnection trunk groups, including policies and/or engineering standards used for making the determination to augment.
6. Please provide floor plans for at least three central offices in Nashville, Tennessee that contain collocation. Please ensure that the floor plans show the entire central office including the BellSouth telecommunications area and the collocation areas. Further, please ensure that the frame placements in the central office are labeled with the type of equipment that is located in those areas.
7. Please provide a tour of any three central offices within the Nashville, Tennessee area that contain collocation arrangements. The tour should permit escorted access to the collocation arrangements, interconnection frames, power equipment used for collocation, and the cable vault.
8. Please produce all documents referring or relating to any actual, contemplated, or proposed procedures by BellSouth to provision a CLEC access terminal in a multiple dwelling unit ("MDU") in each of the states in BellSouth's region within five calendar days of a request by any CLEC that such access terminal be established.
9. Produce all documents referring or relating to any actual, contemplated, or proposed procedures by BellSouth to unbundle its INC and NTW at MDUs in each of the states in BellSouth's region and relinquish the first NTW pair to a CLEC, where BellSouth is not using the first pair to provision service.
10. Please produce all documents referring or relating to any BellSouth facilities used in the provisioning of service to customers residing in MDUs in each of the states in

BellSouth's region that are made available for access or use by any CLEC affiliated with BellSouth.

11. Please produce all documents referring or relating to the procedures by which any CLEC affiliated with BellSouth gains access to or use of BellSouth facilities to provision service to customers residing in MDUs in each of the states in BellSouth's region.
12. Produce copies of all documents that relate to the performance of LCSC operations, including, but not limited to, "LCSC Weekly Operations Reports," "LCSC Daily Reports", or similarly captioned reports from January 2000 to the present.
13. Please produce all training materials and procedure manuals/documents provided to and/or used by LCSC service representatives.
14. Produce copies of all documents that relate to BellSouth's internal change control processes for its own internal OSS and for the CLEC OSS.
15. Produce copies of all documents and BellSouth approved "interview summaries" provided to KPMG consulting in connection with or related to the preparation and issuance of Observation 86 and Exception 88 in the Florida Third Party Test.
16. Produce copies of the minutes and notes taken by all participants in meetings of all groups of BellSouth employees and its contractors or vendors associated with BellSouth's review and implementation of change requests under the Change Control Process Document. This should include but not be limited to the groups known as the "Triage Committee", the "Change Review Board", the "Directors Committee", the "Release Prioritization Team", the "Third Party Testing Team", the "Regulatory Team" the "LCSC Team", the "Project Managers", the "BellSouth IT Team", and "BTSP", from January 2000 to the present.
17. Produce copies of all "Master Prioritization Lists" and "NCS Integrated Lists" produced and used by these groups (listed above) from January 2000 to the present.
18. Produce copies of all documents associated with all "force models" used to project and administer staffing of the LCSC and CWINS centers.
19. Produce copies of all documents associated with the "beta" testing of the CLEC and Vendor Application Evaluation (CAVE) testing environment for TAG and EDI.
20. Produce copies of all documents associated with the use of CAVE by CLECs and vendors related to the implementation of Release 9.4.

21. For the latest 12 month period, produce the actual performance data resulting from the internal measures identified in Interrogatory No. 19 to the extent that such data was not included in PMAP.
22. For the latest 12 month period, produce copies of the internal reports that BellSouth has utilized to communicate and analyze the data generated by the internal performance measures identified in Interrogatory No. 19.
23. Produce the performance measurement plan that BellSouth utilizes to collect and report the internal performance data identified in Interrogatory No. 19.
24. Please provide copies of all "N" orders and "D" orders associated with MCI Georgia LSRs that fell out for manual processing during the month of June 2001.
25. If BellSouth provides a line splitter in some line sharing arrangements with data-CLECs, please attach relevant provisions of any interconnection agreement consisting of such terms and conditions.
26. Please provide any and all documents that evidence BellSouth's assertion that additional line sharing training is being provided to its technicians.
27. Please provide any documentation relating to any "work package" that addresses wiring problems in splitters that were installed for line sharing.
28. Please provide all documentation supporting your responses to BellSouth's deployment plans for NGDLC.
29. Since January 2000, produce any document that compares or analyzes BellSouth's internal performance data to evaluate the extent to which BellSouth's actual performance results for OSS functions (pre-ordering, ordering, provisioning, maintenance & repair, and billing) are similar in each state of its nine state region.
30. Please provide all documentation reflecting policies since January 2000 giving higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance and repair and billing) to CLEC service requests (e.g. resale, unbundled network elements, or interconnection for customers in Georgia or Florida as compared to similar orders for CLEC customers in other states in the BellSouth region, such as Tennessee.
31. Produce all documents, including work papers, related to PriceWaterhouseCoopers testing of BellSouth's DOE and SONGS systems.

32. Provide all work force models and related documents used by BellSouth to determine staffing levels for centers that support CLECs, including but not limited to the LCSCs and CWINs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of August, 2001, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

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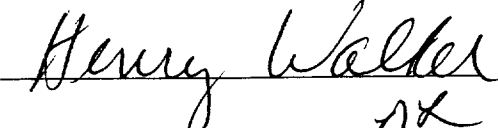
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